

**RECEIVED**

**Apr 18 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM YORK COUNTY  
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

---

Appellate Case No. 2022-00290

Case No. 2020-CP-46-02006

---

Eastwood Construction Partners, LLC and  
Eastwood Development Corporation, ..... Appellants,

v.

GHD Brooks Creek, AF-Brooks Creek, LLC,  
GHD River Falls, LLC, AF-River Falls, LLC,  
Greenhawk Corporation, Inc. and TRI Pointe Homes, Inc., ..... Respondents.

---

**NOTICE OF APPEAL**

---

Eastwood Construction Partners, LLC and Eastwood Development Corporation appeal the two Orders of the Honorable Daniel D. Hall signed on April 18, 2022, as to GHD Brooks Creek, AF-Brooks Creek, LLC, GHD River Falls, LLC, AF-River Falls, LLC, and Greenhawk Corporation, Inc. (“GHD”) and TRI Pointe Homes Holdings, Inc. (“TRI Pointe”). The Orders were filed by the Clerk on April 18, 2022, granting GHD and TRI Pointe’s Motions to Lift Automatic Stay of the Court’s February 15, 2022 orders. A copy of the Orders appealed from are attached as Exhibit A to this notice of appeal.

Respectfully submitted,

[Signature block to follow]

April 18, 2022

s/James Edward Bradley  
James Edward Bradley, SC Bar #66130  
Moore Bradley Myers Law Firm, P.A.  
P.O. Box 5709  
West Columbia, SC 29171  
(803) 796-9160  
[ward@mbmlawsc.com](mailto:ward@mbmlawsc.com)

James C. Adams, II (NC Bar 18063)  
Brooks Pierce McLendon & Leonard, LLP  
PO Box 26000  
Greensboro, NC 27420  
(336) 271-3117  
[jadams@brookspierce.com](mailto:jadams@brookspierce.com)  
*Admitted Pro Hac Vice*

Attorneys for Appellants

Other Counsel of Record:

Andrew A. Mathias, SC Bar #76220  
Konstantine P. Diamaduros, SC Bar  
#102231  
Nexsen Pruet, LLC  
PO Box 10648  
Greenville, SC 29603-0648  
864-370-2211  
[AMathias@nexsenpruet.com](mailto:AMathias@nexsenpruet.com)  
[KDiamaduros@nexsenpruet.com](mailto:KDiamaduros@nexsenpruet.com)

John I. Mabe, NC Bar #9355  
Nexsen Pruet, PLLC  
4141 Parklake Ave., Suite 200  
Raleigh, NC 27612  
919-755-1800  
[jmabe@nexsenpruet.com](mailto:jmabe@nexsenpruet.com)  
*Admitted Pro Hac Vice*

Attorneys for Respondents GHD  
Brooks Creek, AF-Brooks Creek,  
LLC, GHD River Falls, LLC, AF-  
River Falls, LLC, and Greenhawk  
Corporation, Inc.

Stephen M. Cox, SC Bar #12263  
Robinson, Bradshaw & Hinson, PA  
PO Box 12070  
Rock Hill, SC 29731  
803-325-2900  
[SCox@robinsonbradshaw.com](mailto:SCox@robinsonbradshaw.com)

Amanda P. Nitto, SC Bar #101834  
Robinson, Bradshaw & Hinson, PA  
101 N. Tryon Street, Suite 1900  
Charlotte, NC 28246  
704-377-8184  
[ANitto@robinsonbradshaw.com](mailto:ANitto@robinsonbradshaw.com)

Attorneys for Respondent TRI Pointe  
Homes, Inc.

**RECEIVED**

**Apr 18 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM YORK COUNTY  
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

---

Appellate Case No. 2022-000290  
Case No. 2020-CP-46-02006

---

Eastwood Construction Partners, LLC and  
Eastwood Development Corporation, ..... Appellants,

v.

GHD Brooks Creek, AF-Brooks Creek, LLC,  
GHD River Falls, LLC, AF-River Falls, LLC,  
Greenhawk Corporation, Inc. and TRI Pointe Homes, Inc., ..... Respondents.

---

**PROOF OF SERVICE**

---

I, Lynn G. Ivey, an employee of the Moore Bradley Myers Law Firm, P.A., certify that I have served the Notice of Appeal, Verification of Allen Nason, Eastwood SCACR 241 (d)(7) Petition, Expedited Request, and Exhibit List on the Respondents by transmitting by electronic mail, addressed to their attorneys of record as follows:

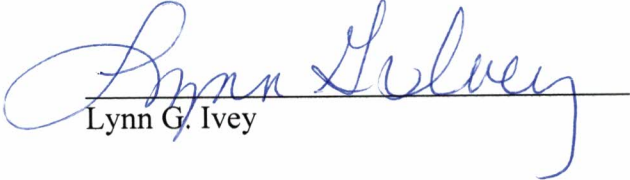
Andrew A. Mathias  
Konstantine P. Diamaduros  
Nexsen Pruet, LLC  
PO Box 10648  
Greenville, SC 29603-0648  
[AMathias@nexsenpruet.com](mailto:AMathias@nexsenpruet.com)  
[KDiamaduros@nexsenpruet.com](mailto:KDiamaduros@nexsenpruet.com)

John I. Mabe  
Nexsen Pruet, LLC  
4141 Parklake Ave., Suite 200  
Raleigh, NC 27612  
[jmabe@nexsenpruet.com](mailto:jmabe@nexsenpruet.com)

Stephen M. Cox  
Robinson, Bradshaw & Hinson, PA  
PO Box 12070  
Rock Hill, SC 29731  
[SCox@robinsonbradshaw.com](mailto:SCox@robinsonbradshaw.com)

Amanda P. Nitto  
Robinson, Bradshaw & Hinson, PA  
101 N. Tryon Street, Suite 1900  
Charlotte, NC 28246  
[ANitto@robinsonbradshaw.com](mailto:ANitto@robinsonbradshaw.com)

West Columbia, South Carolina  
April 18, 2022

  
Lynn G. Ivey



S. Jahue Moore\*  
 James Edward Bradley\*  
 Sheila McNair Robinson  
 Christian G. Spradley  
 William H. Edwards  
 Stanley L. Myers  
 Jane H. Downey\*  
 S. Jahue Moore, Jr.  
 William B. Fortino  
 Ralph Nichols Riley, Jr.  
 John C. Bradley, Jr.

April 18, 2022

Melissa K. Moore  
 Lester McGill Bell, Jr.  
 Bryan C. Letteer  
 Sierra D. Carini  
 Lawrence D. Turner  
 Brendan J. Green

*Retired*  
 J. Mark Taylor\*\*  
 Robert D. Hazel†  
 C. David Sawyer, Jr.†  
 Billy C. Coleman (1916-2019)

The Honorable Jenny Abbott Kitchings  
 Clerk of Court, South Carolina Court of Appeals  
 1220 Senate Street  
 Columbia, SC 29201  
 VIA Electronic Filing

**RECEIVED**

**Apr 18 2022**

**SC Court of Appeals**

Re: Eastwood Construction Partners, LLC et al v. GHD Brooks Creek, LLC et al,  
 Appellate Case No. 2022-000290 Case No. 2020-CP-46-02006

Dear Ms. Kitchings:

I hope you are well. Please find enclosed via electronic filing the following documents:

- Notice of Appeal
- Verification of Allen Nason;
- Eastwood SCACR 241(d)(7) Petition, Expedited Request;
- Copy of Confidentiality Order in matter; and
- Exhibit List; and
- Selected Exhibits A through SS not believed to be covered by the confidentiality order.

We will be sending our firm check for the filing fee, and will file a proof of service shortly. In addition, we are delivering to the Clerk of Court's office tomorrow those exhibits which we believe are covered by the existing confidentiality order so that they may be filed under seal. Please let us know if a motion is needed or if these should be handled in a different manner. Previously an appeal of the Form-4s was filed. This appeal is of the actual orders. As such the exhibits for the two appeals are the same except for Exhibit A. In the former appeal, Exhibit A was the Form-4s. In this Appeal, Exhibit A is the actual orders.

Please contact our office with any questions or concerns. Thank you for your assistance with these filings.

Sincerely,

Lynn G. Ivey  
 Assistant to James Edward Bradley

The Honorable Jenny Abbott Kitchings

April 18, 2022

Page 2

Enclosures

cc: Allen Nason (via email)  
James Adams, Esquire (via email)  
John Mabe, Esquire  
Stephen Cox, Esquire  
Andrew A. Mathias, Esquire  
Konstantine P. Diamaduros, Esquire  
Amanda Nitto, Esquire